

Massachusetts Electric

A National Grid Company



Alexandra E. Singleton
Senior Attorney

July 19, 2005

Howard B. Bernstein
RPS Program Manager
Massachusetts Division of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

Re: Notice of Inquiry Regarding Low-Emission, Advanced Biomass Power Conversion Technologies

Dear Mr. Bernstein:

In accordance with the Division of Energy Resources (“DOER”) and Department of Environmental Protection’s (“DEP”) joint July 1, 2005 Notice in this proceeding, Massachusetts Electric Company and Nantucket Electric Company (together “Mass. Electric” or “Company”) submit the following initial comments.

Mass. Electric generally supports the reasonable broadening and clarification of the existing renewable portfolio standard (“RPS”) regulations to promote certainty as to the kinds of technologies that will qualify for treatment as low-emission, advanced biomass power conversion technologies. Mass. Electric also supports the development of a reasonably liberal interpretation of the existing RPS statute. In particular, Mass. Electric suggests that DOER accomplish these objectives so that additional renewable projects will be developed. This will help to reduce the current shortage of renewable energy credits (“RECs”), reduce the need to make alternative compliance payments, and drive down the cost of RECs for Massachusetts customers.

Mass. Electric appreciates the opportunity to provide these comments.

Very truly yours,

Alexandra E. Singleton

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